



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 05 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED 7009 1680 0000 7663 6902

Mr. Michael R. McKinnon
President
Rogers Brothers Galvanizing
1925 Kishwaukee Street
Rockford, Illinois 61104

Re: Notice of Violation
Rogers Brothers Galvanizing
EPA ID No.: ILD005113063

Dear Mr. McKinnon:

On May 29, 2013, a representative of the U.S. Environmental Protection Agency inspected the Rogers Brothers Galvanizing (RBG) facility located in Rockford, Illinois. The purpose of the inspection was to evaluate RBG's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. We have enclosed a copy of the inspection report for your reference.

Based on information provided by RBG personnel, review of records, and physical observations made by the inspector at the time of the inspection, EPA has determined that RBG is engaged in the storage of hazardous waste without a permit, and is in violation of certain requirements of the Illinois Administrative Code (IAC) and United States Code of Federal Regulations (C.F.R.). To be eligible for the exemption from having a hazardous waste storage permit, RBG must be in compliance with the conditions of 35 IAC §§ 722.134(a) and (c) [40 CFR §§ 262.34(a) and (c)]. We find that RBG was not in compliance with the following conditions for a hazardous waste storage permit exemption, and in violation of the following requirements:

1. A generator must determine whether a waste it generates is a hazardous waste. See, 35 IAC § 722.111 [40 C.F.R. § 262.11]. At the time of the inspection, RBG had not made a hazardous waste determination on unknown solid material inside of a rusty, dented and open container, which was located in the building with an address of 1925 Kishwaukee Street (1925 Building) (see photographs 3 and 4 of the attached inspection report). RBG therefore violated the above-referenced generator requirement.

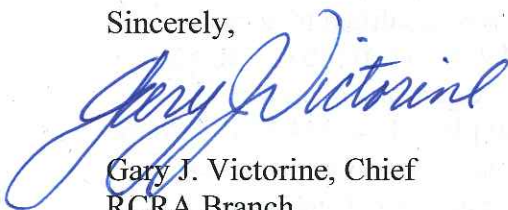
2. Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, 35 IAC § 739.122(c)(1) [40 C.F.R. § 279.22(c)(1)]. At the time of the inspection, a container for collection of used oil located in the 1925 Building was not labeled with the words "Used Oil" (see photograph 5 of the attached inspection report). RBG therefore violated the above-referenced used oil generator requirement.
3. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers to store hazardous waste must mark the containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers. See, 35 IAC § 722.134(c)(1)(B) [40 CFR § 262.34(c)(1)(ii)]. At the time of the inspection, two 55-gallon containers for the accumulation of hazardous waste oily skimmings located adjacent to two sulfuric acid process tanks were not labeled with the words, "Hazardous Waste" or other words to describe their contents. These containers were located in the building addressed 2007 Kishwaukee Street (2007 Building). Therefore, RBG failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption.
4. In order to avoid the need for a hazardous waste storage permit, a large quantity generator using satellite accumulation containers to store hazardous waste must always keep the containers closed except when it is necessary to add or remove waste. See, 35 IAC §§ 722.134(c)(1)(A) and 725.273(a) [40 CFR §§ 262.34(c)(1)(i) and 265.173(a)]. This is also a requirement of owners and operators of hazardous waste storage facilities that use containers to store hazardous waste under 35 IAC § 724.273(a) [40 C.F.R. § 264.173(a)]. At the time of the inspection, two 55-gallon containers for the accumulation of hazardous waste oily skimmings located adjacent to two sulfuric acid process tanks in the 2007 Building were open at a time when waste was not being added to nor removed from the containers. RBG therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the storage facility container requirement.
5. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a contingency plan for the facility that includes, among other items, the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. See, 35 IAC §§ 722.134(a)(4) and 725.152(d) [40 C.F.R. §§ 262.34(a)(4) and 265.52(d)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC 724.152(d) [40 C.F.R. 264.52(d)]. At the time of the inspection, the home address of Mr. Agapito Chavez was not included in RBG's hazardous waste contingency plan, despite Mr. Agapito being listed as an emergency coordinator. RBG therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage facility contingency planning requirement.

6. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a contingency plan for the facility that includes, among other items, a description of the arrangements agreed to by local police department, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 35 IAC § 725.137 [40 C.F.R. § 265.37]. See, 35 IAC §§ 722.134(a)(4) and 725.152(c) [40 C.F.R. §§ 262.34(a)(4) and 265.52(c)]. This is also a requirement of owners and operators of hazardous waste storage facilities under 35 IAC § 724.152(c) [40 C.F.R. § 264.52(c)]. At the time of the inspection, RBG's contingency plan did not describe the above-mentioned arrangements. RBG therefore failed to comply with the above-mentioned condition for a hazardous waste storage permit exemption, and violated the hazardous waste storage facility contingency planning requirement.
7. A large quantity generator who accumulates hazardous waste on-site and who does not meet the conditions for a hazardous waste storage permit exemption of 35 IAC §§ 722.134(a) and (c) is an operator of a hazardous waste storage facility, and is required to obtain an Illinois hazardous waste storage permit. See, 35 IAC § 703.121(a) [40 C.F.R. § 270.1(c)]. Upon failing to comply with the permit exemption conditions identified in items 3-6, above, RBG's failure to apply for and obtain a hazardous waste storage permit violated the permitting requirements of 35 IAC § 703.121(a) [40 CFR § 270.1(c)]

At this time, EPA is not requiring RBG to apply for and obtain a hazardous waste storage permit so long as it immediately establishes compliance with the conditions for an exemption outlined above. According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Todd Brown, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Mr. Brown, of my staff, at (312) 886-6091.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSTALLATION NAME: Rogers Brothers Galvanizing

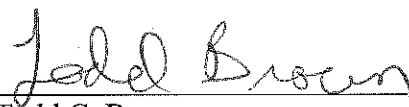
U.S. EPA ID No.: ILD005113063

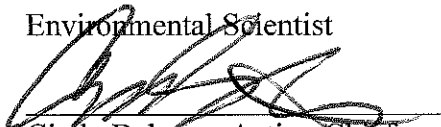
LOCATION ADDRESS: 1925 Kishwaukee Street
Rockford, Illinois 61104

NAICS CODE: 33812 Metal Coating, Engraving (Except Jewelry
and Silverware), and Allied Services to
Manufacturers

DATE OF INSPECTION: May 29, 2013

U.S. EPA INSPECTOR: Todd C. Brown

PREPARED BY: 
Todd C. Brown
Environmental Scientist
Date 7/8/13

REVIEWED BY: 
Cindy Dabner, Acting Chief
Compliance Section 1
RCRA Branch
Date 7-17-13

I. Purpose of Inspection

The purpose of this unannounced compliance evaluation inspection (CEI) was to evaluate the compliance of Rogers Brothers Galvanizing (RBG), located in Rockford, Illinois, with the Resource Conservation and Recovery Act (RCRA), with respect to its management of hazardous waste and used oil.

II. Site Description

RBG conducts zinc galvanizing on carbon steel. Its facility includes two buildings with addresses of 1925 and 2007 Kishwaukee Street (1925 and 2007 buildings), respectively; and outdoor yard space (Figure 1). The 1925 building is mainly utilized for office space, product/raw material storage, and maintenance activities. The galvanizing equipment is located at the 2007 building.



Figure 1: Aerial view of Rogers Brothers Galvanizing, Rockford, Illinois. The red line denotes approximate facility boundaries.

Galvanizing proceeds in a series of tanks as follows. In-coming parts are cleaned by immersion in tanks of sodium hydroxide and/or 10% sulfuric acid, each of which is followed by a water rinse. Parts are subsequently immersed in a series of tanks containing zinc ammonium chloride flux (to prevent oxidation), molten zinc (850 °F), and quench water. Cyanides are reportedly not used in the process. Over the last five years, RBG has reportedly reduced the amount of lead in its process through changes in raw material specification.

Over time, the sulfuric acid used in the cleaning phase becomes contaminated with zinc and iron. To increase its useful lifetime, it is processed in an on-site acid purification unit which “chills”

the acid, and removes the metals through centrifugation. It is reportedly a closed-loop system. A solid, zinc ferrous sulfate stream is generated by the purification unit, which is stored in bags, and shipped off-site for use in the manufacture of fertilizer and animal feed.

RBG is a large quantity generator of hazardous waste. Hazardous wastes generated by RBG include:

- 1) Spent sulfuric acid which can no longer be purified;
- 2) Oily skimmings taken from the top of the sulfuric acid process tanks;
- 3) Solids from periodic cleanout of the sodium hydroxide and flux tanks; and
- 4) Solvent from a parts washer serviced by Safety Kleen.

Used oil is generated by the forklift shop. Spent fluorescent lamps are shipped off-site to Safety Kleen.

RBG reported the following hazardous waste streams in its 2011 Annual Hazardous Waste Report.

- 28,000 gallons of spent acid possessing the characteristics of corrosivity and cadmium/lead toxicity;
- 7,260 gallons of spent acid possessing the characteristics of corrosivity and chromium/lead toxicity; and
- 1,127 gallons of aqueous waste, without cyanides, possessing the characteristics of corrosivity and chromium/lead toxicity.

Reportedly non-hazardous waste streams shipped off-site for recycling include bottom dross that accumulates over time in the molten zinc tanks; and oxidized zinc skimmed from the top of the molten zinc tanks (zinc skimmings).

RBG has approximately 95 employees, operating over two production and one maintenance shift.

III. Opening Conference

I arrived at RBG on May 29, 2013, at approximately 9:45 A.M. Upon arrival, I presented my credentials to, and conducted an opening conference with, Mr. Tom Ferolie, Operations Manager. Mr. Greg Kazmerski, Environmental Protection Specialist, Illinois Environmental Protection Agency (IEPA), was also in attendance.

During the conference, I explained the purpose of the inspection, and interviewed Mr. Ferolie on RBG's operations and waste management activities. Information provided in response to my inquiry is summarized in Section II of this report. I provided Mr. Ferolie with EPA's Small Business Handout, a list of pollution prevention contacts in Region 5, and a pamphlet from the Illinois Sustainable Technology Center. I informed Mr. Ferolie that all information collected

during the inspection could be made available to the public upon request; unless RBG made a confidential business information claim, which could later be supported.

IV. Site Tour

At approximately 10:17 A.M., Messrs. Ferolie, Kazmerski, and I proceeded on a tour of the facility, including both buildings and the outdoor yard space. The following is a summary of my observations as noted during the tour.

Eight bags of zinc iron sulfate generated by the acid purification system were located in the 1925 building (photographs 1 and 2). The containers were marked with dates ranging between May 21 and 29, 2013.

One container of an unknown material was present in the 1925 building, adjacent to a container of "hydrated lime" (photographs 3 and 4). The container was open and in poor condition (i.e., rusted and dented). Its contents appeared solid.

One large tote container for the collection of used oil was present in the 1925 building. The container was not visibly labeled as "used oil" (photograph 5).

Fourteen containers of solids removed from a quench water tank (photograph 6) were located in close proximity to a more numerous collection of containers of zinc skimmings (photograph 7). Both materials are reportedly sent off-site for recycling.

Two trailer cars are located on the outdoor portions of RBG's property. One of the trailers contained solid masses of bottom dross removed from the molten zinc tanks (photograph 8). The other contained 55-gallon drums of a material referred to by RBG as "black sal," though labeled "black salt" (photograph 9). Mr. Ferolie explained the generation of this material as follows. Zinc ammonium chloride is added to the top of the molten zinc tanks to aid with keeping parts clean and preventing oxidation. The material eventually needs to be skimmed from the top of the tanks, and is referred to as "black sal." It is reportedly sent off-site for recycling.

Two 55-gallon containers for accumulation of hazardous oily skimmings, generated from two separate sulfuric acid process tanks, were located in the 2007 building (photographs 10 and 11). Both contained some amount of material, were open, and unlabeled.

There are four tanks in the 2007 building which feed sulfuric acid from the process lines to the acid purification system (photographs 12 and 13). A larger tank holding quench water is also located in this area. The acid purification system operates daily on a batch basis. Tanks reportedly begin filling on Monday, and will be empty by Friday. It is a reportedly closed loop system. The area appeared to be provided with secondary containment.

V. Records Review

At approximately 11:08 A.M., I conducted a review of records. These included: hazardous waste manifests; land disposal restriction notifications; zinc iron sulfate analytical and shipping records; annual hazardous waste reports; contingency plan; RCRA training documents; and a list of facilities who receive zinc-bearing secondary materials from RBG for recycling.

Hazardous Waste Manifests

Manifests were on-site dating back at least three years. Land disposal restriction notifications were included in the files. The records indicate two waste streams have been manifested off-site thus far in 2013: oily skimmings from the sulfuric acid tanks, and spent sulfuric acid.

The oily skimmings have been sent off-site five times during 2013. The material is described on the manifests as: "waste corrosive liquid sulfuric acid, lead;" and by the hazardous waste numbers: D002, D007 and D008. The records indicate shipments of 55 gallons once or twice per month. All were destined to the Safety Kleen facility in Dolton, Illinois (EPA ID number: ILD980613913).

Two shipments of "spent waste sulfuric acid" by tanker car occurred on May 24, 2013. The volume of each shipment was approximately 3,400 and 3,500 gallons, respectively. The hazardous waste numbers D002, D006 and D008 were included on the manifests. Both shipments were destined to Vickery Environmental in Ohio (OHD020273819).

Zinc Iron Sulfate Records

I reviewed and obtained copies of: (1) a fertilizer certification of analysis corresponding to a sample of RBG's zinc iron sulfate stream; and (2) two example shipping records for recent shipments of zinc iron sulfate to two of the receiving facilities (Attachment C).

The fertilizer certification of analysis provides analytical results for a sample described as "zinc sulphate heptahydrate" [sic] collected in August 2000. Zinc concentration is reported at 14.75%. "Total" concentrations for the Toxicity Characteristic Leaching Procedure (TCLP) metals were included in the analysis.

Bills-of-lading are maintained for the off-site shipments of zinc iron sulfate dating back at least as far as 2010. The material was shipped to the following two facilities in 2013:

- Agrium U.S., Inc. Micronutrient Division
2405 W. Vasser Road
Reese, Michigan 48757

- Add Iron Corporation
730 Miley Road
North Lima, Ohio 44452

During the record review, I discussed with Mr. Ferolie and Mr. Michael R. McKinnon, President of RBG, the conditions of the solid waste exclusion at 40 C.F.R. § 261.4(a)(20) for zinc-bearing secondary materials used to manufacture fertilizer. In response to my inquiry, I was provided with the following information.

- Zinc iron sulfate is stored on-site for approximately two weeks before shipment.
- RBG does not receive confirmation of receipt from the receiving facilities.
- RBG has not notified the IEPA that it is claiming the exclusion at 40 C.F.R. § 261.4(a)(20) for its zinc iron sulfate stream.
- RBG does not send notifications to the receiving facilities that the zinc iron sulfate is subject to the conditions of the exclusion at 40 C.F.R. § 261.4(a)(20).

I explained to Messrs. Ferolie and McKinnon that the conditions for exclusion at 40 C.F.R. § 261.4(a)(20) would only be applicable if the zinc iron sulfate met the definition of a hazardous waste, which I could not determine at the time of the inspection.

Contingency Plan

While reviewing RBG's contingency plan, I noted the following.

- 1) The emergency coordinators are listed as Mr. Ferolie and Mr. Agapito Chaves. Mr. Chaves' home address is not included in the plan.
- 2) The plan does not describe arrangements made with local authorities and emergency responders (e.g., fire department, police, hospital, etc.).

RCRA Training Documents

RBG maintains records of the training it provides to employees for compliance with RCRA hazardous waste regulations. Documents reviewed included: sign-in sheets listing the name of the employees who have completed the training and their respective job titles; and a description of the material covered during the training.

Off-site Shipments of Zinc Secondary Materials for Recycling

I obtained a copy of a spread sheet which lists the customers to which RBG sends its bottom dross, zinc skimmings, and black sal (identified as spent flux) (Attachment D).

I inquired of Messrs. Ferolie and McKinnon as to the manner in which these materials are recycled. In response, it was explained that the dross and skimmings undergo metals reclamation,

after which the remaining material is used in fertilizer production. At the time of the inspection, they were not sure as to the use of the black sal, but stated they would inquire, and provide me with the information.

VI. Closing Conference

After the record review, I conducted a closing conference with Messrs. Ferolie and McKinnon. At that time, I discussed the zinc-fertilizer exemption conditions at 40 C.F.R. § 261.4(a)(20); as well as potential deficiencies observed during the inspection, which included: satellite container labeling and closing, and contingency plan content.

I departed RBG at approximately 12:30 P.M.

Attachments

- A: Inspection Photographs
- B: RCRA Generator Inspection Checklist (Part 722)
- C: Zinc Iron Sulfate Records
- D: Spreadsheet of Customers Receiving Secondary Materials from RBG

Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.

Photo Number 1

Photo Filename DSCN0558.jpg

Date/Time 5/29/2013
10:23:46 AM

Photographer Todd C. Brown

Description

Containers of zinc iron sulfate. The material is generated by an on-site recycling process that removes accumulated iron and zinc from sulfuric acid so it can be recycled back to the galvanizing process. Location: 1925 Building.



Photo Number 2

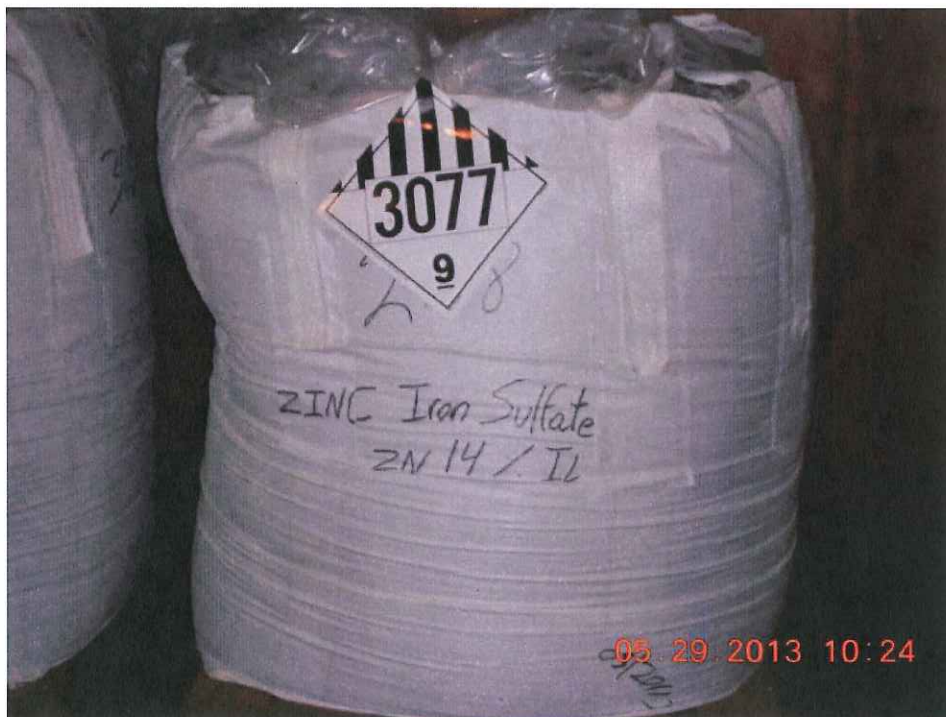
Photo Filename DSCN0559.jpg

Date/Time 5/29/2013
10:24:02 AM

Photographer Todd C. Brown

Description

Close-up of one of the containers of zinc iron sulfate featured in photograph 1.



Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.

Photo Number 3

Photo Filename DSCN0560.jpg

Date/Time 5/29/2013
10:29:02 AM

Photographer Todd C. Brown

Description

Open, un-labeled 55-gallon container
(middle container) of unknown material.
Location: 1925 Building.



Photo Number 4

Photo Filename DSCN0561.jpg

Date/Time 5/29/2013
10:29:12 AM

Photographer Todd C. Brown

Description

Top view of the container featured in
photograph 4.



Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.

Photo Number 5

Photo Filename DSCN0562.jpg

Date/Time 5/29/2013
10:32:18 AM

Photographer Todd C. Brown

Description

Container for the storage of used oil. The container was not labeled. Location: 1925 Building.



Photo Number 6

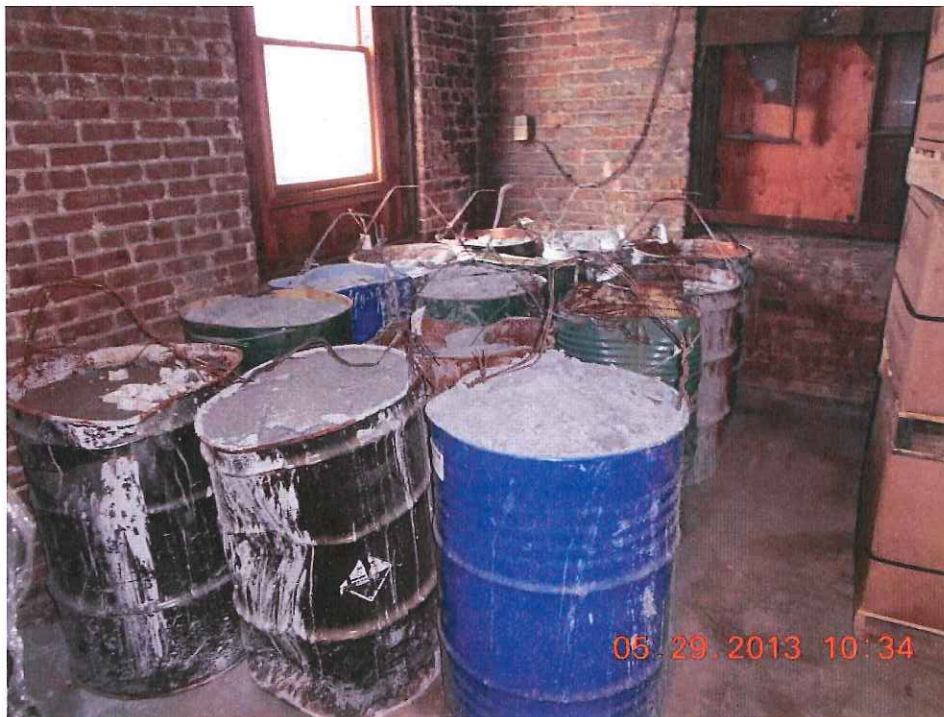
Photo Filename DSCN0563.jpg

Date/Time 5/29/2013
10:34:56 AM

Photographer Todd C. Brown

Description

Fourteen containers of zinc-bearing solids removed from the quench tank. Location: 1925 Building.



Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.

Photo Number 7

Photo Filename DSCN0564.jpg

Date/Time 5/29/2013
10:36:18 AM

Photographer Todd C. Brown

Description

Containers of zinc-bearing solids skimmed from the surface of the molten zinc tanks.
Location: 1925 Building.



Photo Number 8

Photo Filename DSCN0565.jpg

Date/Time 5/29/2013
10:40:04 AM

Photographer Todd C. Brown

Description

Bottom slag from the molten zinc tanks.
Location: Trailer outside.



Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.

Photo Number 9

Photo Filename DSCN0566.jpg

Date/Time 5/29/2013
10:42:04 AM

Photographer Todd C. Brown

Description

Containers of "black sal." Location: Trailer outside.



Photo Number 10

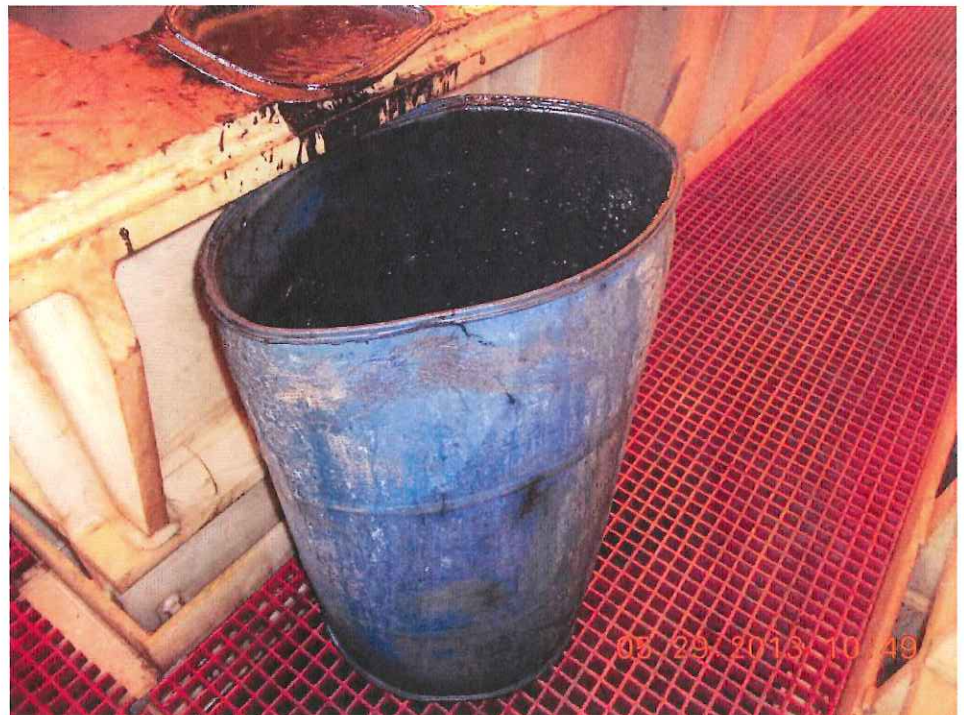
Photo Filename DSCN0567.jpg

Date/Time 5/29/2013
10:49:24 AM

Photographer Todd C. Brown

Description

55-gallon container for accumulation of oily skimmings from a 10% sulfuric acid process tank. The container was open and unlabeled. Location: 2007 Building.



Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.

Photo Number 11
Photo Filename DSCN0568.jpg
Date/Time 5/29/2013
10:49:58 AM
Photographer Todd C. Brown

Description

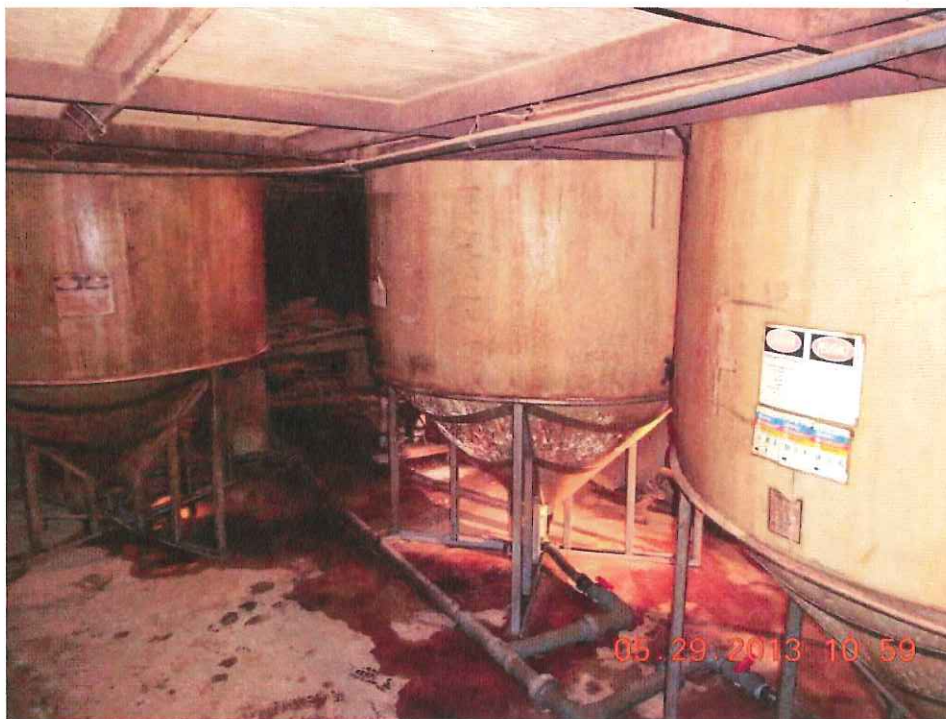
Second 55-gallon container for the accumulation of oily skimmings from a 10% sulfuric acid process tank. The container was open and unlabeled. Location: 2007 Building.



Photo Number 12
Photo Filename DSCN0569.jpg
Date/Time 5/29/2013
10:59:02 AM
Photographer Todd C. Brown

Description

Tanks associated with the sulfuric acid recycling system. Location: 2007 Building.



Attachment A: Photographs for Rogers Brothers Galvanizing (ILD005113063). Rockford, Illinois.

Photo Number 13

Photo Filename DSCN0570.jpg

Date/Time 5/29/2013
10:59:12 AM

Photographer Todd C. Brown

Description

Tanks associated with the sulfuric acid recycling system. Location: 2007 Building.



Attachment B

RCRA Generator Inspection Checklist (Part 722)

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (>1000 KG/MO.)	
	SUBPART A: GENERAL	
722.111	Section 722.111 Hazardous Waste Determination Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? <i>see report</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? <i>see report</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <i>NI</i>	808.121(a)
722.112(a)	Section 722.112 USEPA Identification Numbers Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? <i>for identified HAZ wastes</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	SUBPART B: THE MANIFEST	
722.120(a)	Section 722.120 General Requirements Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <i>NI</i>	722.120(d)
722.121(a)	Section 722.121 Acquisition of Manifests Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? <i>Uniform manifest</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(b)
722.122	Section 722.122 Number of Copies Does the manifest consist of at least 6 copies? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
722.123(a)	Section 722.123 Use of the Manifest For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <i>NI</i>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <i>NI</i>	722.123(c)

JBS

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	SUBPART C: PRE-TRANSPORT REQUIREMENTS	
722.130	<p>Is there any hazardous waste ready for transport off-site? Yes _____ No <u>✓</u> N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A <u>✓</u></p>	722.130
(722.134(a))	<p>Section 722.134 Accumulation Time Has the generator complied with the following requirements: Yes _____ No _____ N/A _____</p>	
(722.134(a)(1))	<p>A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC? <i>open Containers</i> Yes _____ No <u>✓</u> N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)? Yes _____ No _____ N/A <u>✓</u></p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>✓</u></p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection? Yes _____ No _____ N/A <u>✓</u></p>	
(722.134(a)(2))	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? <i>none in storage other than satellite</i> Yes _____ No _____ N/A <u>NI</u></p>	
(722.134(a)(3))	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? <i>no per satellite</i> Yes _____ No <u>✓</u> N/A _____</p>	
(722.134(a)(4))	<p>Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)? <i>Contingency plan deficient</i> Yes _____ No <u>✓</u> N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers? Yes <u>✓</u> No _____ N/A _____</p> <p>If "No", go to Subpart J.</p>	
	SUBPART I: USE AND MANAGEMENT OF CONTAINERS	
(725.211)	<p>Has the generator closed an accumulation area? Yes _____ No _____ N/A <u>✓</u></p>	725.211
(725.214)	<p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A <u>✓</u></p>	725.214
(725.271)	<p>If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <u>✓</u></p>	
(725.272)	<p>Is the waste compatible with the container and/or liner? Yes <u>✓</u> No _____ N/A _____</p>	
(725.273(a))	<p>Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes _____ No <u>✓</u> N/A _____</p>	
(725.273(b))	<p>Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <u>✓</u> No _____ N/A _____</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.274)	<p>Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <u> </u> No <u> </u> N/A <u> </u></p>	
(725.276)	<p>Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.</p>	
(725.277)	<p>Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>COMMENTS:</p>	
(725.278)	<p>Section 725.278 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Comments:</p> <p>Does the generator accumulate and/or treat hazardous waste in tanks? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Note: If "No", go to Subpart C.</p> <p>SUBPART J: TANK SYSTEMS</p> <p>Has the generator closed an accumulation area? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes <u> </u> No <u> </u> N/A <u> </u></p>	
(725.211)		725.211
(725.214)		725.214
(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Note: A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.</p> <p>If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.</p> <p>b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).</p> <p>c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.291(a))	For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? Yes _____ No _____ N/A _____	
(725.291(b))	Does this assessment consider at least the following: 1) design standards for the tank and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the wastes? Yes _____ No _____ N/A _____ 3) existing corrosion protection measures? Yes _____ No _____ N/A _____ 4) documented age of the tank system? Yes _____ No _____ N/A _____ 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ N/A _____ *IRPE = Independent Registered Professional Engineer	
(725.291(c))	Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? Yes _____ No _____ N/A _____ Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).	
(725.292(a))	For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system? Yes _____ No _____ N/A _____ Does the assessment include, at a minimum, the following: 1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____ 2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____ 3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____ 4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____ 5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____	
(725.292(g))	Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <ol style="list-style-type: none"> compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____ placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes _____ No _____ N/A _____ provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____ sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____ <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <ol style="list-style-type: none"> a liner (external to the tank); or a vault; or a double-walled tank; or an equivalent device (approved by the Board)? <p>Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.294(c))	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)?</p> <p>Yes _____ No _____ N/A _____</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p>Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	
(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)? Yes _____ No _____ N/A _____</p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> - the resulting waste, mixture or dissolved material is no longer ignitable or reactive? Yes _____ No _____ N/A _____ - Section 725.117(b) is complied with? Yes _____ No _____ N/A _____ <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction? Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies? Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line? Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank? Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with? Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with? Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p>Section 725.302 Air Emission Standards</p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A _____</p> <p>Comments:</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.131)	SUBPART C: PREPAREDNESS AND PREVENTION Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES	
(725.151(a))	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.151(b))	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.152(c))	<p>Does the plan describe arrangements with:</p> <ul style="list-style-type: none"> - police and fire departments? Yes _____ No <u>1</u> N/A _____ - hospitals? Yes _____ No _____ N/A _____ - contractors? Yes _____ No _____ N/A _____ - emergency response teams? Yes _____ No _____ N/A _____ 	
(725.152(d))	<p>Does the plan contain the current emergency coordinator's name, phone (office and home) and address? <i>Not for backup</i> <i>i.e. address</i></p> <p>Yes _____ No <u>1</u> N/A _____</p>	
(725.152(e))	<p>Does the plan identify all emergency equipment including:</p> <ul style="list-style-type: none"> - description? Yes <u>1</u> No _____ N/A _____ - capability? Yes _____ No _____ N/A _____ - location? Yes _____ No _____ N/A _____ <p>Is the list of emergency equipment up-to-date?</p> <p>Yes _____ No _____ N/A <u>1</u></p>	
(725.152(f))	<p>Does the plan include:</p> <ul style="list-style-type: none"> - an evacuation plan? Yes <u>1</u> No _____ N/A _____ - an evacuation signal? Yes <u>1</u> No _____ N/A _____ - alternate evacuation routes? Yes <u>1</u> No _____ N/A _____ 	
(725.153)	<p>Has the contingency plan (including all revisions) been:</p> <ul style="list-style-type: none"> a) maintained at the facility? Yes <u>1</u> No _____ N/A _____ b) submitted to: <ul style="list-style-type: none"> - police department? Yes <u>1</u> No _____ N/A _____ - fire department? Yes <u>1</u> No _____ N/A _____ - hospital? Yes <u>1</u> No _____ N/A _____ - emergency response teams? Yes _____ No _____ N/A _____ 	
(725.154)	<p>Has the contingency plan been reviewed and revised whenever:</p> <ul style="list-style-type: none"> a) regulations are revised? Yes _____ No _____ N/A _____ b) the plan fails in an emergency? Yes _____ No _____ N/A _____ c) the facility changes in a way that modifies the emergency response necessary? Yes _____ No _____ N/A _____ d) information regarding emergency coordinators changes? Yes _____ No _____ N/A _____ e) information regarding equipment changes? Yes _____ No _____ N/A _____ 	
(725.155)	<p>Is the emergency coordinator on-site or on call at all times? Yes <u>1</u> No _____ N/A _____</p> <p>Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <u>1</u> No _____ N/A _____</p> <p>Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <u>1</u> No _____ N/A _____</p>	
(725.156)	<p>If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes _____ No _____ N/A <u>1</u></p> <p>Note: If the facility has had a release, explain in detail.</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p>Section 725.116 Personnel Training</p> <p>Does the facility have a training program? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <u> </u> No <u> </u> N/A <u> </u></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <u> </u> No <u> </u> N/A <u> </u> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <u> </u> No <u> </u> N/A <u> </u> - key parameters for automatic waste feed cut-off systems? Yes <u> </u> No <u> </u> N/A <u> </u> - communications or alarm systems? Yes <u> </u> No <u> </u> N/A <u> </u> - response to fire or explosions? Yes <u> </u> No <u> </u> N/A <u> </u> - response to groundwater contamination incidents? Yes <u> </u> No <u> </u> N/A <u> </u> - shutdown of operations? Yes <u> </u> No <u> </u> N/A <u> </u> 	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <u> </u> No <u> </u> N/A <u> </u> <u>NS</u></p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes <u> </u> No <u> </u> N/A <u> </u></p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> 1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <u> </u> No <u> </u> N/A <u> </u> 2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <u> </u> No <u> </u> N/A <u> </u> 3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <u> </u> No <u> </u> N/A <u> </u> 4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <u> </u> No <u> </u> N/A <u> </u> 	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <u> </u> No <u> </u> N/A <u> </u></p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	Section 728.107 Waste Analysis and Recordkeeping Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A _____ Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	Section 722.134 Satellite Accumulation Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No _____ N/A <input checked="" type="checkbox"/> If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(g)	Note: A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	SUBPART D: RECORDKEEPING AND REPORTING	
722.140(a)	Section 722.140 Recordkeeping Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)
722.141(a)	Section 722.141 Annual Reporting Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.141(a)
	Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Section 722.142 Exception Reporting	722.141(b)
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	Section 722.143 Additional Reporting Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
	SUBPART E: EXPORTS OF HAZARDOUS WASTE	
722.150	Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.150
	SUBPART F: IMPORTS OF HAZARDOUS WASTE	
722.160	Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.160
	SUBPART G: FARMERS	
722.170	Is the generator a farmer? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.170
	COMMENTS:	

Attachment C

Zinc Iron Sulfate Records

**FERTILIZER
CERTIFICATE OF ANALYSIS**

LAB SAMPLE: BB4625

DATE RECEIVED: 8/14/00

DATE REPORTED: 8/21/00

SAMPLE DESCRIPTION: Zinc Sulphate Heptahydrate

SAMPLE IDENTIFICATION: #1 *Rockford, IL Plant*

METHOD	ANALYSIS	RESULTS
	Total Zinc	14.75 %
	Total Sulfur	10.98 %
	Total Arsenic	< 5.0 mg/Kg mg/kg = ppm
	Total Barium	8.8 mg/Kg
	Total Cadmium	5.8 mg/Kg
	Total Chromium	21.2 mg/Kg
	Total Cobalt	16.9 mg/Kg
	Total Lead	26.3 mg/Kg
	Total Mercury	< 5.0 mg/Kg
	Total Molybdenum	< 5.0 mg/Kg
	Total Nickel	224 mg/Kg
	Total Selenium	< 5.0 mg/Kg
	Total Silver	< 5.0 mg/Kg

Approved by: *Vernon Palst*

1-800-321-1562
(740) 335-1562
Fax: (740) 335-1104
E-Mail: info@spectrumanalytic.com

P.O. BOX 639 1087 JAMISON ROAD
WASHINGTON C.H., OHIO 43160

SOIL ANALYSIS
PLANT ANALYSIS
FERTILIZER ANALYSIS
MANURE ANALYSIS

U T O H O

Shipper No. _____

Carrier No. _____

Date 5-1-12

Landsman

(Name of Carrier)

{SCAC}

TO: 9/ Abrium US INC Micro nutrient Div
Consignee

FROM: Shipper **ROGERS BROTHERS INC**

On Collect or Delivery moments, the letters "CO" must appear before consignee's name - - or as

Street 2405 W. Vassar Rd CH-157

Street **1925 KISHWAUKEE STREET**

Destination ROOSE MT Zip Code 4875

Order: **ROCKFORD, IL**

Zip Code 61104

Destination ROCKE ME
Vehicle 1974-1975 2637

U.S. DOT Hazmat
Reg. Number

Route

No. Shipping Units	* HM	Kind of Packaging, Description of Articles, Special Marks and Exceptions	Weight (Subject to Correction)	RATE	CHARGES
15	X	NA3077, Other regulated Substances, Solid N.O.S., Zinc Iron Sulfate, 9, PG III	43.826		
		Zinc Iron Sulfate, Moist No # 6478 ERG # 171 - copy provided			
		* Third Party Bill *			
		To: Greenville Chemical Sales 4345 N Lincoln Ave Chicago, IL 60618			

REMIT
C.O.D. TO:
ADDRESS

COD

Amt: \$

C.O.D. FEE:	
PREPAID <input type="checkbox"/>	\$
COLLECT <input type="checkbox"/>	\$

Note — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other charges.

TOTAL CHARGES:	\$
----------------	----

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____

lawful charges.

FREIGHT CH
FREIGHT PREPAID
except when

\$ _____ per _____

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the

(Signature of Consignor.)

box at right is checked	<input checked="" type="checkbox"/>	to be collect
condition of contents of packages unknown marked		

consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of rail or any of, said property over all or any portion of said route to destination and as to each party at any time interested

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns

SHIPPER **ROGERS BROTHERS INC.**

CARRIER LANDSTAR

PER *Tom Fexler*

PER *[Signature]*

EMERGENCY RESPONSE
TELEPHONE NUMBER: 800-451-8346

DATE 3-21-03

* Mark with an "X" to designate Hazardous Material as defined in the Department's regulations.

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* Mark with an "X" to designate Hazardous Material as defined in the Department of Transportation Regulations governing the transportation of hazardous materials. The use of this column is an optional method for identifying hazardous materials on bills of lading per Section 172.203(a)(1)(ii) of Title 49, code of Federal Regulations. Also, when shipping hazardous materials, the shipper's certification statement prescribed in Section 172.204(a) of the Federal Regulations must be indicated on the bill of lading, unless a specific exception from this requirement is provided in the Regulations for a particular material.

Carrier No. _____

Date 3-14-13

Big Green Express
(Name of Carrier)

(Name of Carrier)

(ISCAC)

Route	No. Shipping Units	* HM	Kind of Packaging, Description of Articles, Special Marks and Exceptions	Weight (Subject to Correction)	RATE	CHARGES
	15	X	R. Q. Other regulated substances, Solid, Nos, 9, NA3077, PG III (Zinc Iron Sulfate)	42.810		
	Bags.					
			Zinc Iron Sulfate, Moist			
			Load # 2383			
			ERG # 171-copy provided w/MSDS			

REMIT C.O.D. TO: ADDRESS	COD Amt: \$	C.O.D. FEE: PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/> \$
Note - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ per _____	Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges. <i>Samuel G. Gault</i> (Signature of Consignor.)	TOTAL CHARGES: \$ FREIGHT CHARGES FREIGHT PREPAID <input type="checkbox"/> Check box except when box at right is checked <input checked="" type="checkbox"/> If charges are to be collect <input checked="" type="checkbox"/>

RECEIVED, subject to the classifications and lawfully filed tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER	ROGERS BROTHERS INC.	CARRIER	T B G E
PER	<i>Thom Ferial</i>	PER	Ron Wallis
EMERGENCY RESPONSE TELEPHONE NUMBER:	800-457-8346	DATE	3-17-13

Monitored at all times the Hazardous Material is In transportation including storage incident! to transportation (\$172,604)

BL-601-3
PRINTED IN U.S.A.

81-601-3

PRINTED IN U.S.A.

Attachment D

Spreadsheet of Customers Receiving Secondary Materials from RBG

Scrap Sales Customers						
Billing Address		Shipping Address				
Add Iron Corporation	2012	Add Iron Corporation				
One Reservoir Cir. Ste 100		730 Miley Road				
Baltimore, MD 21208		North Lima, OH 44452				
EA Raw Materials	2012	EA Raw Materials	EA Raw Materials %Acme Transp.	Dross / Skimm / Spent Flt		
P.O. Box 318		11 Henry Henning Drive	15840 West Avenue			
Maybrook, NY 12543		Maybrook, NY 12543	Harvey, IL			
Greenview Chemical Sales	2012	Agrium US Inc.		↓	↓	
3759 North Ravenswood Unit 222		2405 Vasser Road				
Chicago, IL 60613		Reese, MI 48757				
US Zinc Votorantim Metals	2012	US Zinc	Dross / Skimm			
6020 Navigation Blvd.		6020 Esperson St.				
Houston, TX 77001		Houston, TX 77001				
Richker Metal Inc.	2012	Whiting Metal				
2932 Danalda Dr.		2230 Indianapolis Dr.				
Los Angeles, CA 90064		Whiting, IN 46394				
Ritchey Metals Co., Inc.	2012	% Acme Transportation				
30 Georgetown Road		5950 W. 66th Street				
Canonsburg, PA 15317		Bedford Park, IL 60638				
SB Enterprises	2012	SB Enterprises % CMA CGM Line	SB Enterprises % MSC Line	SB % YM Green	SB Enterprises % MSC Line	SB Enterprises
4 Tessier Drive		7000 W. 71st Street	7000 W. 71st Street	2664 Baseline Rd V090W	2101 W. 59th St.	5 Endicott Rd.
Andover, MA 01810		Bedford Park, IL 60638	Bedford Park, IL 60638	Elwood, IL	Chicago, IL 60638	Andover, MA 01810

no spent flt

